

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA :

V. : CRIMINAL NO: 2:24-cr-00263-MAK

DONALD MICHAEL :

ORDER

AND NOW, this day of , 2024, it is hereby ORDERED that Defendant's Unopposed Motion To Extend Deadlines For Time To File Pretrial Motions in the above captioned matter is hereby GRANTED.

BY THE COURT:

J.

R. EMMETT MADDEN, ESQUIRE
THE PHILLY LAWYERS
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**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA :

V. : CRIMINAL NO: 2:24-cr-00263-MAK

DONALD MICHAEL :

**DEFENDANT’S UNOPPOSED MOTION TO EXTEND DEADLINES FOR
TIME TO FILE PRETRIAL MOTIONS**

TO THE HONORABLE JUDGE MARK A. KEARNEY:

AND NOW, Defendant, Donald Michael, by and through his attorney,

R. Emmett Madden, Esquire, hereby submits this unopposed motion to extend deadlines for time to file pretrial motions and avers the following:

1. On July 18, 2024, the government sealed a 4-count Indictment charging Defendant Donald Michael with Conspiracy to Manufacture Child Pornography and other related charges.

2. Mr. Michael is charged in that Indictment with the following: Count One Conspiracy to Manufacture Child Pornography, Conspiracy to Receive and Distribute Child Pornography, Receipt of Child Pornography and Distribution and Attempted Distribution of Child Pornography.

3. On August 27, 2024, R. Emmett Madden, Esquire entered his appearance to represent Mr. Michael.
4. Pretrial Motions are due January 3, 2025.
5. Trial is scheduled for Tuesday, February 18, 2024, at 9:00 A.M., in Courtroom 6B, United States Courthouse, 601 Market Street, in Philadelphia Pennsylvania.
6. This is an extremely serious matter where defendant faces a lengthy period of imprisonment.
7. Counsel is requesting to extend deadlines for an additional 60 days from the January 3, 2025 motions date to file pretrial motions.
8. Counsel is requesting to continue Trial for an additional 30 days.
9. Defendant acknowledges and waives his speeding trial rights.
10. Assistant United States Attorney Kelly Harrell is unopposed to the extension request.

WHEREFORE, Defendant respectfully requests the Unopposed Motion to Extend Deadlines for Time to File Pretrial Motions be Granted.

Date: 1/2/2025

Respectfully submitted by:

/S/ R. EMMETT MADDEN, ESQUIRE
R. EMMETT MADDEN, ESQUIRE
Attorney for Defendant

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CERTIFICATE OF SERVICE

I, R. Emmett Madden, Esquire, hereby certify that, on this date, I have served a copy of the attached Defendant's Motion Unopposed Motion To Extend Deadlines For Time To File Pretrial Motions upon the following by electronic mail:

The Honorable Mark A. Kearney
United States District Court
Eastern District Court of Pennsylvania
6613 U.S. Courthouse
601 Market Street
Philadelphia, PA 19106
Via Email

AUSA Michelle Rotella
AUSA Kelly Harrell
United States Attorney's Office
615 Chestnut Street
Suite 1250
Philadelphia, PA 19106
Via Email

Date: 1/2/2025

Respectfully submitted by:

/S/ R. EMMETT MADDEN, ESQUIRE
R. EMMETT MADDEN, ESQUIRE
THE PHILLY LAWYERS
Attorney I.D. No. 86894
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Attorney for Defendant